



**WATFORD
BOROUGH
COUNCIL**

Equality Impact Analysis

Title of policy, function or service	Community Protection Compliance Policy 2021-2026
Lead officer	Jamie Mackenzie
Person completing the EIA	Jamie Mackenzie
Type of policy, function or service:	Existing (reviewed) <input checked="" type="checkbox"/> New/Proposed <input type="checkbox"/>
Version & Date	Version 1.0 01 September 2021

1. Background

Watford Borough Council (the council) is the regulatory authority for environmental health and licensing matters within the borough. As a regulator, the council is required to publish a policy on how it will approach regulation of businesses.

In 2011, the council developed an Environmental Health and Licensing Compliance Policy to ensure that decisions and processes related to compliance were clearly explained for all residents, visitors and businesses. This policy (the Policy), now named the Community Protection Compliance Policy 2021-2026, ensures that decisions are fair and consistent, and that the right standards are applied to ensure we achieve the highest levels of compliance with national and local regulations.

The Policy is regularly reviewed and the current policy is now due for review. Prior to any changes to the existing policy taking effect, a public consultation is carried out.

2. Focus of the Equality Impact Analysis

This Equality Impact Assessment has been created to ensure that the Policy is fair, transparent and does not disadvantage or unlawfully discriminate against any person or group.

3. Engagement and consultation

A full public consultation on the draft policy took place between 12 July 2021 and 23 August 2021

This included:

- placing the information about the consultation, and the various methods of responding to the consultation, on the Watford Borough Council website
- notification through the council Communications team to various publication including the local newspaper
- directly notifying a number of local and national organisations and authorities, including business forums and membership organisations, licensing authorities, national charities, disability advocacy groups and trade publications
- an audio reading of the proposed policy and consultation documents to be made available through collaboration with the Watford Talking Newspaper

There was one response to the consultation. This response included, among a number of suggestions, an improvement to the detail concerning equality contained in section 1.8. This change was made to the policy.

4. What we know about Watford

Age and Health

Watford has a younger population than Hertfordshire and England as a whole.

Those who report ill health and who are limited in mobility is marginally lower than the UK average

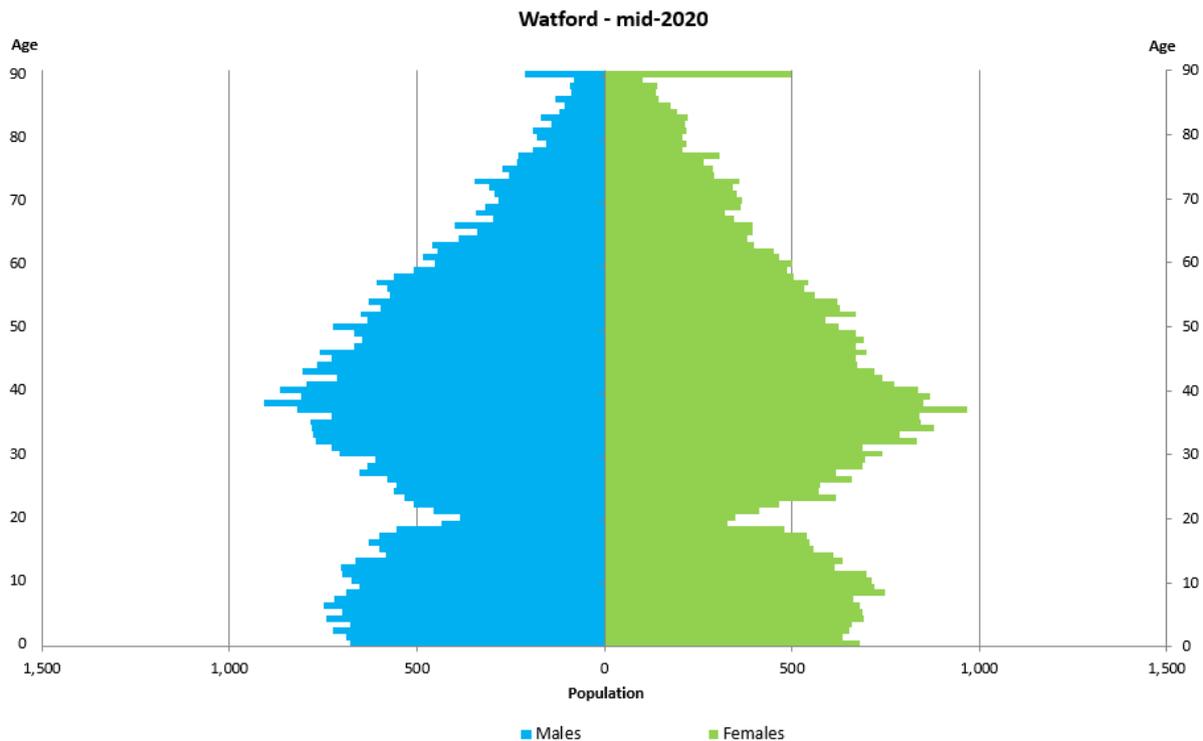
In context, the 2011 Census reports that 5500 people reported day to day activities being limited a lot by health and disability issues. Almost 7000 residents reported day to day activities being limited a bit. It seems reasonable that Census 2021 figures, given the increase in population, could be somewhere around 6,500 - 7000.

Around 85% of the population of Watford state that they have 'good health' and just under 14% recorded a disability (from Census 2011). We do not have details as to what these disabilities are but they will include a wide range of physical and mental health disabilities or impairment. The council will receive the outputs of Census 2021 from 2022, which will confirm a range of information on our resident population, including those with health and disability issues.

The 2019 NHS Health Profile's (the most recent profile available) summary conclusion is that the health of people in Watford is 'varied' compared with the England average.

About 11% (2,305) of children live in low income families. Life expectancy for both men and women is similar to the England average. Life expectancy is 6.1 years lower for men and 2.9 years lower for women in the most deprived areas of Watford than in the least deprived areas.

Sex



Ethnicity

Watford has a very diverse population, more so than the rest of Hertfordshire; it is one of the strengths of our town and what makes us such a vibrant and diverse town.

For Watford, the Census 2011 shows the following main breakdown in terms of ethnicity: White British (61.9%), White other (7.7%), Pakistani (6.7%), British Indian (5.5%), British other Asian (4.4%) and African (3.5%), White Irish (2.3%) and Caribbean (1.7%).

In 2016, the ONS published population estimates by ethnicity. This did not report ethnicities to the level of granularity of the Census. The estimates for 2016 were: White British (59% - 57,000 residents), Asian / Asian British (19% - 19,000 residents), All Other White (12% - 12,000 residents), Black / African / Caribbean / Black British (4% - 4,000 residents), Mixed / Multiple Ethnic Group (4% - 4,000 residents) and Other Ethnic Group (1% - 1,000 residents).

Religion / belief

The religious breakdown in the Census 2011 of the main religions in Watford was: Christian (54.1%), Muslim (9.8%), Hindu (4.8%), with no religion stated at 21.4%.

Sexual orientation

Watford has no specific data on sexual orientation. This was a new question for the Census 2021 so we will be able to benchmark in future.

Education and skills

A skilled workforce supports the economic development and employment aspirations for Watford.

There has been a mostly increasing trend in educational attainment in Watford over the last few years. Watford's working age population has the fourth highest percentage (44.4%) in Hertfordshire of those with qualifications at NVQ 4 and above

Deprivation

The English Indices of Deprivation (IoD) 2019 were published by the Government in September 2019, and updates the previous 2015 Indices, published in September 2015. The Indices of Deprivation measure relative levels of deprivation in 32,844 small areas or neighbourhoods, called Lower-layer Super Output Areas, in England

The IoD2019 is based on 39 separate indicators, organised across seven distinct domains of deprivation which are combined and weighted to calculate the Index of Multiple Deprivation 2019

In the IMD 2019, Watford is ranked 195 out of 317 authorities, putting it in the 7th decile nationally. This means that, overall, Watford is less deprived than half the authorities in England.

Watford is the third most deprived authority in Hertfordshire. (Stevenage and Broxbourne are the most deprived.) However, three Hertfordshire authorities are among the 10% least deprived authorities in England (Three Rivers, East Herts and St Albans).

Overall, Watford is not an area with significant deprivation issues and the majority of the LSOAs within the town are in the bottom 50% of LSOAs nationally for deprivation; the borough's position has improved relative to that of 2015.

The combined deprivation index, which weights income and employment more heavily than the other domains, obscures the more deprived areas in Watford, which are affected by crime, living environment deprivation, health and disability, and education, skills and training deprivation in particular. This is, at least in part, because income and employment deprivation are less of an issue for Watford than for other areas.

5. How will the council ensure equality is promoted by the Policy?

Watford Borough Council is committed to championing equality and embracing diversity across the full range of our services, whether we deliver the service ourselves or through partnership, and in our role as an employer.

To assist in gathering responses from people with a broad range of protected characteristics officers of the Community Protection service have actively sought to notify and engage as many residents, businesses and groups as possible.

There are a number of people with protected characteristics who could be impacted by the proposed policy and it is essential that all views are considered when determining the impact of the Policy.

Under the Equality Act 2010, three areas need to be considered when analysing the equality impact of the Corporate Plan:

1. **eliminate** discrimination, harassment, victimisation and any other conduct that is prohibited by or under the Act
2. **advance** equality of opportunity between people who share a relevant protected characteristic and people who do not share it
3. **foster** good relations between people who share a relevant protected characteristic and people who do not

A. Positive impacts

- Following a comprehensive consultation the council can be satisfied that the consultation provided opportunity for all residents, visitors and business operators to have their say on the final policy, and that the final policy, as amended by consultation responses, and as a policy that directly impacts a person's ability to access a business, run a business, use local services and enjoy a high quality of life as a resident or visitor to the borough, is fair and proportionate for all.
- Following consultation and a period of review by officers we can be sure that any additional safeguards against discriminatory practice or impact have been added prior to consideration by the Licensing Committee. The Policy supports business by setting clear guidelines, and by helping to promote the high standards on offer in Watford. This should have a positive impact on all those with protected characteristics and particularly those with additional vulnerabilities.
- We know that many people who run their own business do so as sole-traders or with very small teams and that access to resources to assist in compliance may be difficult to come by or to understand. To address this the council works hard to educate and to offer assistance to business owners whenever possible. Against this, the council must balance the need to ensure public safety and access to a fair and equitable environment for all. This will mean taking enforcement action against businesses that are non-compliant and those which, following advice and assistance, persist in being non-compliant.
- We know that many people who access services in Watford rent homes, visit food

premises, buy goods or services and use transport systems such as hackney carriages and private hire vehicle services have a range of needs and that these customers must be protected from illegal practice, anti-social behaviour and other activities that are detrimental to quality of life and/or harmful to health.

- We know that the addition of information relating to Community Protection Notices and changes to licensing sanctions will increase the perception of safety among the community of Watford.

B. Negative impacts

There should be no negative impacts to the implementation of a fair and proportionate compliance policy. Safeguards against discrimination, and clear statements on working with those who have protected characteristics and/or a range of additional needs, have been made in the Policy. Potential barriers to accessing and understanding the Policy are being addressed through improved communications and options for alternative versions (e.g. translation or large print)

6. Overall conclusion

Overall we can be confident that the Community Protection Compliance Policy 2021-2026 will advance equality of opportunity in Watford. The Policy should reduce instances of discrimination against all those with protected characteristics and will make it more likely that instances of illegal behaviour are dealt with effectively and in a timely manner.

Summary of potential positive and negative impacts on protected characteristics

Protected Characteristic	Positive	Negative	None	Reasons for decision
Age	X			A clear policy on compliance that is proportionate and easy for all to understand is key to advancing equality of opportunity and to improving feelings of safety and wellbeing in the community.
Disability	X			A clear policy on compliance that is proportionate and easy for all to understand is key to advancing equality of opportunity and to improving feelings of safety and wellbeing in the community.
Ethnicity	X	X		<p>A clear policy on compliance that is proportionate and easy for all to understand is key to advancing equality of opportunity and to improving feelings of safety and wellbeing in the community.</p> <p>There could be a negative impact on ethnicity if steps are not taken to ensure that the policy is well communicated and people where English is not their first language are not clear on the implications of the Policy.</p>
Sex	X			A clear policy on compliance that is proportionate and easy for all to understand is key to advancing equality of opportunity and to improving feelings of safety and wellbeing in the community.
Sexual orientation	X			A clear policy on compliance that is proportionate and easy for all to understand is key to advancing equality of opportunity and to improving feelings of safety and wellbeing in the community.

Protected Characteristic	Positive	Negative	None	Reasons for decision
Religion	X			A clear policy on compliance that is proportionate and easy for all to understand is key to advancing equality of opportunity and to improving feelings of safety and wellbeing in the community.
Pregnancy/maternity	X			A clear policy on compliance that is proportionate and easy for all to understand is key to advancing equality of opportunity and to improving feelings of safety and wellbeing in the community.
Gender orientation	X			A clear policy on compliance that is proportionate and easy for all to understand is key to advancing equality of opportunity and to improving feelings of safety and wellbeing in the community.

Summary of potential positive impacts and ways in which they can be ensured

Positive Impact	Protected characteristics	Ways to ensure the positive impact
<p>General increase in compliance with regulations</p> <p>Increased business for local service providers through improved reputation and ability to build a compliant business</p> <p>Better access to local goods and services</p> <p>Reduced instances of anti-social behaviour in the Borough</p>	<p>All</p> <p>All</p> <p>All</p> <p>All</p>	<p>Implement policy as intended</p>

Summary of potential negative impacts and ways in which they can be removed or mitigated

Negative Impact	Protected characteristics	Ways to mitigate the negative impact
<p>Perception that regulation in Watford is difficult to navigate</p>	<p>All</p>	<p>A clear policy on compliance that is proportionate and easy for all to understand is key to advancing equality of opportunity and to improving feelings of safety and wellbeing in the community.</p>
<p>Barriers to accessing the Policy for individuals or groups where English is not a first language</p>	<p>Ethnicity</p>	<p>Information on the council website can be translated through the Browsealoud function. The council has a contract with Language Line so any individual request for translated support can be provided. In other cases translated material can be provided. Through its Covid experience, the</p>

Negative Impact	Protected characteristics	Ways to mitigate the negative impact
		council has built a good understanding of the communication needs of Watford's diverse community.

This EIA has been approved by: Kathryn Robson, Executive Head of Strategy and Communications